

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS**

In re:

Lindsay Lampasona, LLC
Debtor

Chapter 7

Case No. 11-19747 JNF

**MOTION TO EXTEND TIME TO RESPOND TO (1) RYKOR CONCRETE & CIVIL,
INC.'S REQUEST FOR PAYMENT OF ADMINISTRATIVE EXPENSE, AND (2)
MOTION FOR ENTRY OF ORDER APPROVING STIPULATION BY AND BETWEEN
THE DEBTOR AND THE BANK OF CANTON
[Expedited Determination Requested]**

Lynne F. Riley, Chapter 7 Trustee in the above-referenced case, hereby moves to extend the time to respond to (1) Rykor Concrete & Civil, Inc.'s Request for Payment of Administrative Expense [Doc. #208], and (2) Motion for Entry of Order Approving Stipulation By and Between the Debtor and the Bank of Canton [Doc. # 210]. In support of this motion, the Trustee states as follows:

1. The within debtor ("Debtor") filed a Chapter 11 petition on October 14, 2011, which was converted to a case under Chapter 7 on May 21, 2012, and Lynne F. Riley was duly appointed as Trustee of the Debtor's bankruptcy estate.
2. On May 18, 2012, creditor Rykor Concrete and Civil, Inc. ("Rykor"), filed the Request for Payment of Administrative Expenses ("Rykor Admin Request").
3. On May 18, 2012, the Debtor filed a Motion for Entry of Order Approving Stipulation By and Between the Debtor and the Bank of Canton ("Motion to Approve Stipulation," and together with the Rykor Admin Request, the "Motions").
4. The current deadline to file a response to the Motions is June 1, 2012.
5. Since her appointment, the Trustee has been conferring with counsel for Rykor, the

Debtor, and counsel for other creditors and interested parties.

6. In order to allow the Trustee to further confer with the interested parties and to evaluate the Motions, the Trustee requests an additional 14 days, through June 15, 2012, to respond to the Motions.

WHEREFORE, the Trustee requests that the court enter an order (1) extending the deadline to respond to the Motions to June 15, 2012, and (2) granting such other and further relief as is equitable and just.

Respectfully submitted,
Lynne F. Riley, Chapter 7 Trustee

/s/ David Koha
Lynne F. Riley (BBO #561965)
David Koha (BBO # 679689)
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Dated: May 30, 2012

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CERTIFICATE OF SERVICE

I, David Koha, hereby certify that on May 30, 2012, I served a copy of the foregoing, electronically through the Court's CM/ECF System, or via first class mail, postage prepaid, to the following:

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/s/ David Koha